

## USDA PRIVACY IMPACT ASSESSMENT FORM

### Project Name:

**Affiliates Database** – an application in the Conservation Program Delivery IT Investment

### Description of Your Program/Project:

The mission of the Natural Resources Conservation Service (NRCS) is to provide leadership in a partnership effort to help people conserve, maintain, and improve the nation's natural resources and environment. NRCS assists owners of America's private land with conserving their soil, water, and other natural resources. NRCS delivers technical assistance based on sound science and suited to a customer's specific needs.

The Affiliates IT business applications support the conservation planning core mission of NRCS. The Affiliates Database supports business applications that provide support for development and delivery of conservation programs, analyzing and reporting progress, and management applications.

The nature of the NRCS operational environment is a widely distributed operational environment – NRCS provided services in over 3000 offices throughout the US, Caribbean a Pacific Basin – and the complexity of managing natural resource information creates expensive and challenging problems for IT. Unlike more traditional business sectors such as banking or marketing, many of the natural resource business processes have never been automated. The science is often complex and is not well understood. There are considerable differences in the implementation of similar business processes for state to state and office to office. There are few commercially available automated business applications. Application development involves integration of underlying COTS framework software and extensive customization.

The 2002 Farm Bill is changing the way NRCS IT products are developed, managed, delivered, and consumed. In the past the primary users of IT were NRCS employees and to a limited extend conservation districts. The Farm Bill authorized USDA to use Technical Service Providers (TSPs). This authorization is creating a new industry of certified professionals (TSPs) from the private sector, non-profit organizations, and public agencies to provide direct technical assistance and deliver conservation services authorized in the \$3.0 billion in conservation assistance. Technical assistance includes conservation planning and design, layout, installation, and evaluation of approved conservation practices. To be successful and meet the increased demand for providing technical assistance, TSPs like NRCS field offices, will need access to NRCS data and automated conservation planning tools. They will use geospatial technologies like Geographic Information Systems (GIS) and Global Positioning Systems (GPS) to gain efficiencies in planning and installing conservation practices.

## DATA IN THE SYSTEM

1. Generally describe the information to be used in the system in each of the following categories: Customer, Employee, and Other.	<p><i>“Affiliates” cover a range of businesses and individuals who have a role in the delivery of agency conservation programs. An affiliate is a non-employee who performs services, acts on the behalf of the government organization, or whose duties on behalf of government organizations require them to have similar access privileges as government employees.</i></p> <p><i>The data maintained on affiliates varies by type. For ‘volunteers’, a home address is maintained. For Technical Service Providers, an address and SSN is maintained. There are 12 general types of affiliates described currently.</i></p>
2a. What are the sources of the information in the system?	<i>Information is supplied by the affiliate (or the organization the affiliate belongs to), and is entered by a government employee authorized to access the affiliates maintenance application.</i>
2b. What USDA files and databases are used? What is the source agency?	<i>A limited database is in place currently. Expanded usage by the Service Center Agencies will be available with phase 2 of the system.</i>
2c. What Federal Agencies are providing data for use in the system?	<i>Currently: USDA – Natural Resources Conservation Service</i>
2d. What State and Local Agencies are providing data for use in the system?	<i>Conservation Districts, Local Governments, and state conservation agencies to the extent that they have an affiliate relationship to an NRCS office.</i>
2e. From what other third party sources will data be collected?	<i>No third party services are uses.</i>
2f. What information will be collected from the customer/employee?	<i>For identity purposes – name, address, phone, SSN, email, basic demographics.</i>
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	<i>Data is reviewed for accuracy by employees at local offices who have knowledge of the data.</i>
3b. How will data be checked for completeness?	<i>By employees at local offices who have knowledge of the data.</i>

## ACCESS TO THE DATA

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	<i>System managers, developers, authorized agency field personnel, and NRCS managers.</i>
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access	<i>Users do not have access to databases and data. All access is through application systems that control what information a particular user can view and update. Access is determined by</i>

documented?	<i>system owners/sponsors.</i>
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	<i>There will be no direct user access to the affiliates database. NRCS employee's access is restricted to specific actions by the software applications and to specific web screens by the WebCAAF security system.</i>
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	<i>The Affiliates application owner identifies specific access privileges and authority. Each user is restricted to specific actions by the software application, and to specific web screens by the WebCAAF security system. Developers only have access to the systems they are working on. Database administrators control and grant permissions for access to specific databases as authorized by the business application owners.</i>
5a. Do other systems share data or have access to data in this system? If yes, explain.	<i>The affiliate identifier within the database is attached to the person's eAuth account for access to to web-farm hosted applications. This allows a logon ID to be attached to a known person. Authorization roles assigned to the affiliate will be identified through the system-generated affiliate database identifier.</i>
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	<i>Privacy and accessibility rules are identified and specified by the Agency management system owners. System developers design in the appropriate security controls and the IT General Support Systems manage, control and maintain the specified controls.</i>
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	<i>The three service center agencies may contribute records to the database.</i>
6b. How will the data be used by the agency?	<i>See above.</i>
6c. Who is responsible for assuring proper use of the data?	<i>See above.</i>

#### ATTRIBUTES OF THE DATA

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	<i>Yes</i>
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	<i>No, all data collection is known to the customer. The aggregate of all data stores does not produce new revelations.</i>
2b. Will the new data be placed in the individual's record (customer or employee)?	<i>NA</i>

2c. Can the system make determinations about customers or employees that would not be possible without the new data?	NA
2d. How will the new data be verified for relevance and accuracy?	NA
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	NA
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	NA
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	<i>Data is only accessible through business applications, and to specifically-authorized users..</i>
4b. What are the potential effects on the due process rights of customers and employees of: <ul style="list-style-type: none"> <li>• consolidation and linkage of files and systems;</li> <li>• derivation of data</li> <li>• accelerated information processing and decision making;</li> <li>• use of new technologies.</li> </ul>	<i>Affiliates have due process rights regardless of the physical structure of a particular database.</i>

#### MAINTENANCE OF ADMINISTRATIVE CONTROLS

1a. Explain how the system and its use will ensure equitable treatment of customers and employees.	<i>The system is based on agency business processes. Any person who establishes an “affiliate” relationship with the government receives the same attention from the computer, and is processed under the same automated business rules as any other affiliate.</i>
2a. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?	NA
2b. Explain any possibility of disparate treatment of individuals or groups.	<i>There is nothing inherent to the affiliates application that would allow any possibility of disparate treatment.</i>
2c. What are the retention periods of data in this system?	<i>The longevity of the system is not known, but data regularly outlives a particular processing system. Legal requirement for data retention are adhered to, as applicable.</i>
2d. What are the procedures for eliminating the data at the end of the retention period? Where	<i>Current system data has not reached the retention period specified. When this happens the usefulness of the data will be evaluated on a case-by-case basis to determine if it should be</i>

are the procedures documented?	<i>retained or not.</i>
2e. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	<i>NA</i>
3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	<i>No</i>
3b. How does the use of this technology affect customer/employee privacy?	<i>NA</i>
4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u> ? If yes, explain.	<i>No</i>
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	<i>No</i>
4c. What controls will be used to prevent unauthorized monitoring?	<i>NA</i>
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	<i>Notice of Privacy Act System of Records by Owner, Operator or Producer Files (or Volunteer / Employee Files) USDA/NRCS-1</i>
5b. If the system is being modified, will the SOR require amendment or revision? Explain.	<i>NA</i>